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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BOTTIGLIERI DI NAVIGAZIONE SPA

Plaintiff,

-against-

TRADELINE LLC,

Defendant.

Docket No.: 06 Civ. 3705 (LAK)

**DECLARATION IN SUPPORT OF
ORDER TO SHOW CAUSE WHY
ENFORCEMENT OF ORDER
SHOULD NOT BE STAYED**

JACK A. GREENBAUM deposes and says:

1. I am a member of the firm of Blank Rome LLP, attorneys for the Plaintiff, Bottiglieri di Navigazione SPA. This declaration and the accompanying Memorandum of Law are submitted in support of Plaintiff's application by order to show cause for an order staying, pending appeal, this Court's Memorandum Opinion and Order dated February 6, 2007, which granted Defendant's motion to vacate Process of Maritime Attachment and to release restrained funds in the sum of \$242,909.03.


2. This application is made by Order to Show Cause, and a temporary restraining order is requested, because the automatic 10-business day stay of the vacatur of the attachment expires on or about February 22, 2007. Without a temporary restraining order, this application would be futile.

3. Deponent has provided a copy of this application by e-mail to Defendant's counsel, Michael Unger, of Freehill, Hogan & Mahar.

✓ 4. No prior request for this or any similar relief has been made.

I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, N. Y. on February 21, 2007


JACK A. GREENBAUM (JG-0039)